Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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DRAFT

STATEMENT OF LEGAL AND FACTUAL BASIS

Buchanan Generation, LLC
Off State Route 2, one mile southwest of Marvin, Buchanan County, Virginia
Permit No. SWRO11390

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. The facility is also subject to the acid rain regulations at 9VAC5-80-360 through 9VAC5-80-700. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, Buchanan Generation, LLC has applied for renewal of the Title V Operating Permit for its peaking power plant in Buchanan County, Virginia. The Department has reviewed the application and has prepared a draft Article 3 Federal Operating Permit.

Permit Writer: _____ Date: _____
Bruce Mullins
(276) 698-7335

Air Permit Manager: _____ Date: _____
Rob Feagins

Regional Director: _____ Date: _____
Jeffrey Hurst

FACILITY INFORMATION

Permittee
Buchanan Generation, LLC
P.O. Box 166
Springdale Borough, Pennsylvania 15144

Facility
Buchanan Generating Station
Off State Route 2, one mile southwest of Marvin
Buchanan County, Virginia

County-Plant Identification Number: 51-027-00148

FACILITY DESCRIPTION

NAICS Code: 221112 – Fossil Fuel Electric Power Generation

Buchanan Generating Station is a peaking electric power generation facility. It consists of two General Electric LM 6000PC SPRINT simple cycle gas turbine generator sets, using coal seam methane gas exclusively as a fuel. Each turbine has a maximum heat input of 424.6 MMBtu/hr, with a rated peak load of 50.58 MW output.

Emissions of air pollutants from the combustion turbines include Particulate Matter (PM, includes PM10), Volatile Organic Compounds (VOC), Nitrogen Oxides (NO_X), Sulfur Dioxide (SO_2), Carbon Monoxide (CO), and Hazardous Air Pollutants (HAP).

The facility is considered a Title V major source of NO_X and CO. This facility is located in an attainment area for all pollutants, and is not a PSD major source. The facility is currently permitted under a state major new source review (NSR) permit issued on January 31, 2002 (as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021), and a Phase II Acid Rain permit effective through April 18, 2022.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was completed on April 19, 2021. All reports and other data required by permit conditions or regulations, which are submitted to DEQ, have been evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNITS

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
1	S001	General Electric LM 6000PC SPRINT gas turbine	424.6 MMBtu/hr	Water Injection	W101	NO_X	1/31/02 (as amended 9/3/02, 11/14/02, 9/26/03 & 8/17/21)
2	S002	General Electric LM 6000PC SPRINT gas turbine	424.6 MMBtu/hr	Water Injection	W102	NO_X	1/31/02 (as amended 9/3/02, 11/14/02, 9/26/03 & 8/17/21)

EMISSIONS INVENTORY

Emissions from the facility in 2017 are summarized in the following tables.

2017 Criteria Pollutant and Greenhouse Gas Emissions in Tons/Year

Emissions	VOC	CO	SO_2	PM_{10}	$PM_{2.5}$	NO_X	CO_2e
Total	1.77	25.26	0.51	5.55	5.55	64.70	100,151

2017 Facility Hazardous Air Pollutant (HAP) Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Yr
Formaldehyde	0.60

FUEL BURNING EQUIPMENT REQUIREMENTS – (1 & 2)

Citations

The following citations from the Virginia Administrative Codes identify the underlying authorities to implement the specific requirements determined to be applicable in the NSR permit:

9VAC5-50-390: Permits,
9VAC5-50-410: Designated standards of performance,
9VAC5-50-20: Compliance,
9VAC5-50-40: Monitoring,
9VAC5-80-1180: Standards and conditions for granting permits,
9VAC5-50-260: Standards of performance for stationary sources,
9VAC5-50-30: Performance testing,
9VAC5-50-50: Notification, records, and reporting,
9VAC5-20-180: Facility and control equipment maintenance or malfunction,
9VAC5-170-130: Right of entry,
9VAC5-170-160: Conditions on approvals,
9VAC5-80-1210: Permit invalidation, suspension, revocation and enforcement,
9VAC5-80-1240: Transfer of permits,
9VAC5-170-60: Availability of information, and
9VAC5-20-160: Registration.

Limitations

The following limitations are applicable requirements from the state major NSR permit issued on January 31, 2002 (as amended as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021). Condition numbers are from the NSR permit.

Condition 3: The permittee shall meet all the applicable requirements of 40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

Condition 4: Sulfur dioxide and particulate matter (PM) emissions from each combustion turbine shall be controlled by the use of coal seam methane gas fuel, similar to pipeline quality natural gas, with maximum sulfur content not to exceed 0.8 percent by weight. The annual average sulfur content of the coal seam methane gas fuel shall not exceed 0.5 grains per 100 dry standard cubic feet per year, calculated monthly as the average of each consecutive 12-month period.

Condition 5: Nitrogen oxide (NO_X) emissions from each combustion turbine shall be controlled by the use of water injection. When fuel is fired in a combustion turbine, water shall be injected into the combustion turbine to control nitrogen oxide emissions. The rate of water injection shall be sufficient to meet the emissions standards set forth in this permit.

Condition 7: Carbon monoxide (CO), volatile organic compounds (VOC), and PM emissions from each combustion turbine shall be minimized by the use of good combustion operating practices.

Note: The provisions pertaining to control of formaldehyde emissions in Condition 7 of the NSR permit are included in that permit under the provisions of 9VAC5-50, Article 3, Standards of Performance for Toxic Pollutants, applicable at the time of initial NSR permit issuance. Since the provisions of Article 3 have not been included in Virginia's state implementation plan, provisions of that rule are not federally enforceable. Therefore, provisions pertaining to control of formaldehyde emissions in Condition 7 of the NSR permit are state-only enforceable and not included in the Title V renewal permit.

Condition 9: The approved fuel for the combustion turbines is coal seam methane gas. A change in the fuel may require a permit to modify and operate.

Condition 10: The two General Electric LM 6000PC SPRINT gas turbine generator sets shall not operate more than a combined total of 13,400 unit operating hours per year, calculated monthly as the sum of each consecutive 12-month period. The combustion turbines shall consume no more than 5,759 million standard cubic feet (MMSCF) of coal seam methane gas per year, calculated monthly as the sum of each consecutive 12-month period.

Condition 13: Emissions from the operation of the two (2) combustion turbines shall not exceed the limits specified below:

	(each at base/peak load)	(combined total)
Particulate Matter	3.0 lb/hr	20.1 tons/yr
PM10	3.0 lb/hr	20.1 tons/yr
Nitrogen Oxides (as NO_2)	(25 ppmvd*) 39.0 lb/hr	247.9 tons/yr
Carbon Monoxide	51.0 lb/hr	120.6 tons/yr
Volatile Organic Compounds	4.0 lb/hr	8.2 tons/yr
Sulfur Dioxide	2.5 lb/hr	16.8 tons/yr

*(ppm by volume, one hour average at 15% oxygen as a dry sample and at ambient pressure, as measured per EPA Methods 7E of 40 CFR 60 Appendix A)

The approved methods for determining compliance with this condition include compliance with Conditions 3, 4, 5, 6, 7, 9, and 10, or DEQ-approved source emission tests. DEQ reserves the authority to require source emission tests for any regulated air pollutant.

Note: Formaldehyde emission limits in Condition 13 of the NSR permit are included in that permit under the provisions of 9VAC5-50, Article 3, Standards of Performance for Toxic Pollutants, applicable at the time of initial NSR permit issuance. Since the provisions of Article 3 have not been included in Virginia's state implementation plan, provisions of that rule are not federally enforceable. Therefore, provisions pertaining to formaldehyde emission limits in Condition 13 in the NSR permit are state-only enforceable and not included in the Title V renewal permit.

Note: Condition 13 of the NSR permit references using EPA Method 10 for measuring emissions of NO_X. Since EPA Method 10 does not apply to the measurement of NO_X emissions, it is not included in the Title V renewal permit.

Condition 14: Emissions of nitrogen oxides from the operation of each combustion turbine shall not exceed 121.9 ppmvd as a one hour average at 15% oxygen, adjusted to International Standards Organization (ISO) standard ambient conditions in accordance with Subpart GG of the NSPS and Condition 15 of the state major NSR permit listed above. The permittee shall provide hourly average records of the ambient temperature, ambient humidity, and combustor inlet pressure so that the NO_x emissions data can be corrected to ISO standard ambient conditions, upon the request of the DEQ, in order to demonstrate compliance with this emission standard. The permittee shall expeditiously repair or replace ambient monitoring instrumentation in the event of instrument malfunction. In the event of malfunction, equivalent data may be provided from local representative meteorological sources.

Condition 15: Visible emissions from each combustion turbine exhaust stack shall not exceed ten (10) percent opacity as determined by EPA Method 9 (Reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown or malfunction.

Condition 16: Excess emissions from startup, shutdown or malfunction may be permitted, if best operational practices are followed, and if at all times the permittee maintains and operates, to the extent practicable, the affected facility, including associated air pollution equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Allowable episodes of excess emissions from startup, shutdown or malfunction shall in no case exceed 1.0 hours in any 24-hour period, unless specifically authorized by DEQ for longer duration. Excess emissions from startup and shutdown shall be included in total annual facility emissions as determined from data from continuous monitoring systems.

Applicable requirements from 40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines have been incorporated in the requirements from the state major NSR permit listed above.

Monitoring

The following monitoring requirements are applicable requirements from the state major NSR permit issued on January 31, 2002 (as amended as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021). Condition numbers are from the NSR permit.

Condition 6: Continuous monitoring systems (CEMS) shall be installed, operated and maintained to monitor and record emissions of nitrogen oxides (measured as NO_2), as ppmvd corrected to 15% O_2, from the combustion turbines (1 & 2). The CEMS shall be installed, calibrated, maintained, audited and operated in accordance with the requirements of 40 CFR 75.

Condition 11: Continuous monitoring systems shall be installed and operated to monitor and record the fuel consumption in each turbine (1 & 2). These monitoring systems shall be operated at all times and shall be accurate to within ± 5.0 percent. The systems shall be maintained and calibrated in accordance with manufacturer's specifications. As a minimum, the monitoring systems shall be inspected at least annually. The permittee shall maintain the records of fuel consumption at the site. These records shall be kept on file for the most current five year period and available for inspection by DEQ personnel.

Condition 17: The permittee shall monitor the sulfur content of the coal seam methane gas being fired in the combustion turbines (1 & 2), in accordance with Subpart GG of the NSPS and subsection a. below. The permittee shall comply with the custom fuel sulfur monitoring schedule contained in subsections b. and c. of this condition. The permittee may submit subsequent custom fuel sampling schedules through the DEQ for EPA approval. The permittee shall maintain records certifying the sulfur content of the gas.

a. Analysis for the sulfur content of the coal seam methane gas shall be conducted as referenced in 40 CFR 60.334(b)(2), using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels or an approved alternative method. The approved reference methods are: ASTM D1072-80, D3031-81, D4084-82, or D3246 81. Fuel vendor analyses by these methods may be used.

b. Monitoring for the sulfur content of the fuel shall be conducted once per quarter.

c. Should any sulfur analysis required in paragraph b. above indicate noncompliance, the permittee shall notify the Southwest Regional Office. Sulfur monitoring shall be conducted each day the turbines operate during an interim period when this custom schedule is being reexamined due to noncompliance, and those results may be submitted to show compliance.

d. If there is a change in fuel supply, the permittee must notify the Director, Southwest Regional Office of such change for reexamination of this custom schedule. A change in fuel quality may be deemed a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being reexamined.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent 5 years.

Facility monitoring requirements, including at a minimum, those from 40 CFR 60 Subpart GG, are incorporated in the state major NSR permit listed above. Requirements for monitoring the sulfur content of the fuel from Condition 17 of the NSR permit have been inserted in the Title V permit in a manner reflecting the facility's current quarterly monitoring frequency, based on previous periods of monitoring demonstrating compliance at higher frequencies.

The operating permit contains conditions requiring the permittee to conduct monitoring in accordance with 40 CFR 70.6(a)(3)(i). The emission limitations for NO_X are exempt from Compliance Assurance Monitoring (CAM) requirements of 40 CFR 64, as they are evaluated by a CEMS, which qualifies as a continuous compliance determination method.

The permit contains a requirement for performing a visible emissions evaluation (VEE) on each combustion turbine stack each time a Relative Accuracy Test Audit (RATA) is performed on the continuous emissions monitoring systems. The VEE shall be performed in accordance with 40 CFR, Part 60, Appendix A, Method 9, and shall consist of 10 sets of 24 consecutive observations (at 15 second intervals) to yield 6 minute averages. A copy of the test results shall be submitted to the Director, Southwest Regional Office within 45 days after test completion. This will satisfy the periodic monitoring requirement for the visible emission limitation included in the permit.

Recordkeeping

The following recordkeeping requirements are applicable requirements from the state major NSR permit issued on January 31, 2002 (as amended as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021). Condition numbers are from the NSR permit.

Condition 18: The permittee shall maintain records of all emission data and operating parameters for the gas turbine generator sets (1 & 2) necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall include, but are not limited to:

a. The combined fuel consumption of the two combustion turbines, calculated monthly as the sum of each consecutive 12-month period;

b. The number of combined annual unit operating hours, calculated monthly as the sum of each consecutive 12-month period;

c. All the fuel analysis reports for sulfur content in accordance with Condition 17;

d. Annual NO_X emission reports, calculated daily as the sum of each consecutive 365-day period; and

e. Results of visible emissions evaluations of the combustion turbine exhaust stacks.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

Condition 23: In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of 5 years and shall be made available to DEQ personnel upon request, and

b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

Condition 24: The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided, including names of trainees, date of training and nature of training.

Facility recordkeeping requirements from 40 CFR 60 Subpart GG have been incorporated in the recordkeeping requirements from the state major NSR permit listed above.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following are applicable requirements from the state major NSR permit issued on January 31, 2002 (as amended as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021). The condition number is from the NSR permit.

Condition 8: The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.

Reporting

The following are applicable reporting requirements from the state major NSR permit issued on January 31, 2002 (as amended as amended September 3, 2002, November 14, 2002, September 26, 2003, and August 17, 2021). Condition numbers are from the NSR permit.

Condition 12: Quarterly reports of excess emissions shall be submitted to the Director, Southwest Regional Office in accordance with 40 CFR Part 60, Section 7(c). The report shall be postmarked by the 30th day following the end of the calendar quarter. In addition to the information required by 40 CFR part 60, Section 7(c), each report shall include the average fuel consumption, ambient conditions, and gas turbine load during the period of excess emissions. For the purpose of this report, periods of excess emissions are defined as follows:

a. Any one hour period (excluding the 1 hour allowance during a 24-hour period for startup, shutdown, or malfunction) during which the continuous emission monitoring system, exceeds the nitrogen oxide ppmvd limits specified in Condition 13.

b. Any period during which the sulfur content of the coal seam methane gas being fired in the gas turbines exceeds 0.8 percent by weight.

c. Operating hours when monitoring data is not available.

Facility reporting requirements from 40 CFR 60 Subpart GG have been incorporated in the requirements from the state major NSR permit listed above.

In addition to the information included in the semi-annual monitoring report required by the General Conditions of the Title V permit, the semi-annual monitoring report shall also include the following:

a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; and

b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

STREAMLINED REQUIREMENTS

There are no streamlined requirements.

INSIGNIFICANT EMISSIONS UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation[1] (9VAC_)	Pollutant(s) Emitted (9VAC5-80-720 B.)	Rated Capacity (9VAC5-80-720 C.)
T1	Unit 1 – Turbine Lube Oil Tank	5-80-720 C.3	Not Applicable	200 gal
T2	Unit 1 – Generator Lube Oil Tank	5-80-720 C.3	Not Applicable	500 gal
T3	Unit 1 – Hydraulic Oil Tank	5-80-720 C.3	Not Applicable	50 gal
T4	Unit 2 – Turbine Lube Oil Tank	5-80-720 C.3	Not Applicable	200 gal
T5	Unit 2 – Generator Lube Oil Tank	5-80-720 C.3	Not Applicable	500 gal
T6	Unit 2 – Hydraulic Oil Tank	5-80-720 C.3	Not Applicable	50 gal

Emission Unit No.	Emission Unit Description	Citation[1] (9VAC_)	Pollutant(s) Emitted (9VAC5-80-720 B.)	Rated Capacity (9VAC5-80-720 C.)
T7	Oil/Water Separator - Waste Oil Tank	5-80-720 C.3	Not Applicable	150 gal
T8	Oil/Water Separator	5-80-720 B.2	VOC	Not Applicable
T9	Oil/Water Separator	5-80-720 B.2	VOC	Not Applicable

[1]The citation criteria for insignificant activities are as follows:
9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9VAC5-80-720 B - Insignificant due to emission levels
9VAC5-80-720 C - Insignificant due to size or production rate

PERMIT SHIELD AND INAPPLICABLE REQUIREMENTS

40 CFR Part 63 Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines does not apply since the facility is not a major source of HAP.

The startup, shut down, and malfunction opacity exclusion listed in 9VAC5-40-20 A.4. cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9VAC5-40-20 E, which state, "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

The current state major NSR permit for the facility contains no GHG-specific BACT requirements and there have been no modifications at the facility requiring a review of GHG emissions. Therefore, there are no applicable BACT requirements for the facility specific to GHG.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Federal Enforceability

Article 3 (9VAC5-80-490 N) states that all terms and conditions in the Title V permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

Permit Expiration

This condition refers to the Board taking action on a permit application. The "Board" refers to the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

Failure / Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. A facility may make a single report that meets the requirements of 9VAC5-20-180. The report must be made within four daytime business hours of discovery of the malfunction.

Permit Modification

This general condition cites the sections that follow:
9VAC5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9VAC5-80-190. Changes to Permits
9VAC5-80-260. Enforcement
9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

PHASE II ACID RAIN PROGRAM

The Acid Rain permit for the facility expires on April 18, 2022. The Acid Rain permit renewal application was received on September 7, 2021. The Phase II Acid Rain Program requirements, derived from the EPA Acid Rain Permit Application document, are incorporated into the Article 3 permit as Phase II Acid Rain Program conditions.

The two turbines were not eligible for SO_2 allowance allocations by the U.S. EPA under Section 405 of the Clean Air Act and the Acid Rain Program. Therefore, these units have no SO_2

allowances listed in Table 2 of 40 CFR 73.10. SO_2 allowances may be acquired from other sources in addition to those allocated by the U.S. EPA. No revision to this permit is necessary in order for the owners and operators of these units to hold additional allowances recorded in accordance with 40 CFR Part 73. The owners and operators of each unit remain obligated to hold sufficient allowances to account for SO_2 emissions from each unit in accordance with 40 CFR 72.9(c)(1).

The two turbines are gas-fired and not subject to NO_X limitations under 40 CFR Part 76.

NO_x Budget Trading Program

The NO_x Budget Trading Program was the original means by which the Virginia Air Pollution Control Board addressed the transport of ozone-generating pollutants – nitrogen oxides and sulfur dioxide – across state lines as required by EPA's NO_x SIP Call rule. The NO_x SIP Call was superseded by EPA's Clean Air Interstate Rule (CAIR). Virginia implemented CAIR through the NO_x Annual Trading Program, the NO_x Ozone Season Trading Program, and SO_2 Annual Trading Program. Since the NO_x SIP Call has been superseded by CAIR, provisions for the NO_x Budget Trading Program have been removed from the Title V permit.

CROSS-STATE AIR POLLUTION RULE (CSAPR)

Virginia implemented the Clean Air Interstate Rule (CAIR) trading program through the NOx Annual Trading Program, the NOx Ozone Season Trading Program, and SO_2 Annual Trading Program. The 2014 Article 3 renewal permit for the Buchanan Generating Station contained a condition requiring the permittee to comply with all applicable CAIR requirements and included the CAIR permit and permit application as attachments. The Cross-State Air Pollution Rule (CSAPR), which replaced CAIR, was finalized by the U.S. EPA in 2011, and became effective in Virginia in 2015. Conditions have been added to the Article 3 permit for the Buchanan Generating Station incorporating applicable CSAPR requirements. Since CAIR has been replaced and no longer applies, CAIR conditions and attachments have been removed from the Article 3 permit.

CONFIDENTIAL INFORMATION

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit will be published in *The Virginia Mountaineer* newspaper. Public comments will be accepted for a least 30 days following publication.

A copy of the draft permit and public notice will be sent to the United States EPA prior to publication.

A copy of the public notice will be sent to West Virginia, Kentucky and Tennessee as affected states and all persons on the Title IV and Title V mailing lists no later than the date of publication.